



STORMWATER COMPLIANCE INSPECTION REPORT

State of Washington Department of Ecology
3190 – 160th Avenue SE, Bellevue, WA 98008-5452

WADOE Stormwater

Phone: (425) 649-7000
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Section A: General Data

Inspection Date 11/20/2018	NPDES Permit # WAR001134	County King	Receiving Waters Duwamish River	Inspector Ben Billick & Alex White	Facility Type Industrial
Discharges to: Surface Water <input checked="" type="checkbox"/> Ground Water <input type="checkbox"/>				UNANNOUNCED Inspection	

Section B: Facility Data

Name and Location of Site Inspected		Lat & Long		Entry Time	Permit Effective Date
Ardagh Glass Inc. 5801 E Marginal Way S Seattle, WA 98134		Lat: 47.55197012826 Long: -122.339350957719		10:30 AM	01/01/2015
				Exit Time 2:00 PM	Permit Expiration Date 12/31/2019
On-Site Representative(s): Name(s)/Title(s)/Contact number(s) or E-mail				Additional Participants:	
Lana Getubig, EH&S Manager (206) 768-6221; lane.r.getubig@ardaghgroup.com		Albertus Kariko, Operations Manager (206) 768-6275; albertus.f.kariko@ardaghgroup.com			
Responsible Official(s):					
Ben Michaelson, Plant Manager 5801 E Marginal Way S Seattle, WA 98134					
Phone: (206) 768-6241				Yes No Samples Taken? <input type="checkbox"/> <input checked="" type="checkbox"/> Photos Taken? <input checked="" type="checkbox"/> <input type="checkbox"/>	

Section C: Summary of Findings/Comments

BACKGROUND

Ardagh Glass Inc. is covered under Ecology's Industrial Stormwater General Permit (ISGP #WAR001134). Ecology's stormwater unit has conducted an inspection at this Industrial site in the past. Ardagh Glass exceeded the ISGP's numeric effluent limit for total suspended solids (TSS) at their four discharge monitoring points a total of 17 times from January 1, 2017 through the end of the second quarter of 2018. Ecology issued a Warning Letter (Attachment 1) for these TSS exceedances on November 15, 2018. The purpose of this inspection was to follow-up on the TSS effluent limit exceedances described in the Warning Letter, determine the facility's compliance with the ISGP, and provide technical assistance as appropriate.

INSPECTION/OBSERVATIONS

Upon arrival Ecology Inspectors Ben Billick and Alex White met with Lana Getubig, the EH&S Manager of the facility, and Albertus Kariko, the Operations Manager for the facility. We discussed the history of effluent limit and benchmark exceedances at the facility, as well as the treatment BMPs currently installed on-site as a result of a past Level 3 Corrective Action. Treatment BMPs currently installed include treatment catch basins with a filtration and sorbent media system in drainage basins 1, 2, and 3; cisterns with treatment media at most downspouts; and a Contech Vortechs clarifier at outfall 2. Installation of treatment BMPs was completed in 2016. According to L. Getubig, the facility switched from a limestone based treatment media to biochar in the catch basins and cisterns in May 2018. We discussed the TSS effluent limit exceedances and the need for Ardagh Glass to develop a strategy to control TSS and prevent future discharges that exceed the TSS effluent limit and violate the ISGP.

B. Billick and A. White then reviewed ISGP compliance documents for the facility and watched the site's safety training presentation prior to conducting an inspection of the site with L. Getubig.

Document Review:

- Discharge Monitoring Reports (DMRs) are up to date and laboratory analytical reports are retained on-site. Sampling conducted so far for 2018 shows that the facility has already triggered a Level 3 Corrective Action for Copper, as well as Level 2 Corrective Actions for Zinc and Turbidity.
- Monthly inspections of the facility are being conducted. Inspection reports were available for review and appeared complete.
- A copy of the current ISGP is kept in the site log book.
- The SWPPP for the facility is dated 11/2016 and was last signed and certified on 1/12/2018. The SWPPP appeared

complete, with the exception of the following deficiencies:

- A complete spill log is not being maintained for the facility. Large spills are being tracked in an electronic spill log, but a log with records of all spills was not available.
- Installation of treatment BMPs in response to a past Level 3 Corrective Action was completed in 2016, however, the SWPPP states that the installation of treatment BMPs is ongoing. An O&M Manual for the treatment BMPs was included as an appendix to the SWPPP.

Site Inspection:

- The eastern portion of the site discharges to combined sewer and is therefore not covered under the ISGP. The western portion of the site is divided into four drainage basins, each served by a separate storm drainage system with an outfall to the Duwamish River.
- The majority of the site is paved. Alligator cracking and other pavement damage was observed throughout the site. The poor pavement condition likely reduces sweeping efficacy and contributes to sediment and debris control issues on-site.
- Vacuum sweeping of the site is conducted on a weekly basis. Sweeping is conducted by both a street sweeping contractor and by using small, ride-on industrial shop sweepers that are owned by the facility. Despite sweeping activities, significant accumulation of sediment, dust, and particulate debris was observed in multiple locations on-site. Sediment and debris accumulation was particularly high in the drainage basin for outfall 3. The majority of industrial activities in this drainage basin are conducted by Strategic Materials, a tenant of Ardagh Glass that sorts and processes glass for recycling. Track out of fine debris particles from inside Strategic Materials' operations building onto the outside pavement was observed. Piles of debris were also observed on the pavement outside of the Strategic Materials building. Additional areas of heavy sediment and debris accumulation were observed near the bag houses in drainage basin 1 and around large objects (e.g. dumpsters) throughout the site that may not be easily accessed by the street sweepers. We discussed the need for improved sediment control with L. Getubig, as the BMPs currently employed do not provide all known, available, and reasonable methods of prevention, control, and treatment (AKART).
- All dumpsters are fitted with lids that are kept closed when not in use.
- Several of the catch basins on-site required maintenance to remove accumulated sediment and debris from the treatment media/filter inserts.
- A paving contractor was on-site performing concrete work during the inspection. We observed the operator of one of the concrete trucks washing out on-site in drainage basin 3, directly adjacent to the Duwamish River. The operator was attempting to collect the wash water in a five-gallon bucket, but much of it was spilling onto the ground. The operator stopped the washing activities when instructed to do so. Pavement staining that appeared to be from another concrete truck being washed out onto the ground was also observed in one location in drainage basin 2 during the inspection.
- A piece of heavy equipment and a contractor's truck were actively leaking fluid at the time of the inspection. No actions had yet been taken to contain or clean up the leaks when they were observed.
- Spill kits were stored in multiple locations on-site.
- The facility has an on-site maintenance shop for their equipment. The majority of liquid products in the shop were stored on a secondary containment pallet; however, one 55-gallon drum of oil and a few miscellaneous containers of automotive fluids did not have containment. The maintenance shop is relatively small and has a door that opens to the outside, so liquid spills outside of containment could reach the outside.

Section D: Compliance Requirements and Recommendations

- **Ardagh Glass is in violation of permit condition S3.B.4.b.i.3, failure to maintain stormwater drainage/treatment BMPs.** Within 10 calendar days of receipt of this report, inspect all catch basin treatment BMPs, remove excess sediment and debris, and replace treatment media as necessary.
- **Ardagh Glass is in violation of permit condition S3.B.4.b.i.3.d, failure to immediately clean up spills and leaks.** Ensure that future spills and leaks are cleaned up immediately and that contaminated spill cleanup materials are properly disposed of. Ensure that appropriate staff are properly trained in the facility's procedures for identifying and responding to spills and leaks.
- **Ardagh Glass is in violation of permit condition S3.B.4.b.i.7.ii, failure to properly manage washwater.** Immediately ensure that all washing activities, including washout of concrete trucks, are conducted in areas where the washwater can be collected and properly disposed of. Washwater is considered a process water and cannot be

allowed to discharge to surface waters or the storm drainage system.

- **Ardagh Glass is in violation of permit condition S10.C, failure to apply all known and reasonable methods of prevention, control, and treatment (AKART) for the management of sediment, dust, and particulate debris on-site.** Within 30 calendar days of receipt of this report develop and implement a plan to better control sediment, dust, and particulate debris on-site. Ensure that the SWPPP is updated to reflect any changes in BMPs.
- In accordance with permit condition S3.A.4.a.ii, update the facility SWPPP within 30 calendar days of receipt of this report to include a complete spill log and details of the treatment BMPs installed on-site.
- In accordance with permit condition S3.B.4.b.i.4.a, ensure that containers of chemical liquids, fluids, and petroleum products kept in the maintenance shop are stored in secondary containment. Though these materials are stored inside, the small size of the shop and proximity to the outdoors creates a possibility that spills could reach the storm drainage system.
- As described in the Warning Letter dated November 15, 2018, Ardagh Glass has had multiple instances of non-compliance with the TSS effluent limits established in permit condition S6.C.1.c and Table 6 of the ISGP. Ensure that a written response to the Warning Letter is submitted to Ecology within the timeline given in the letter. The response should include information on how Ardagh Glass proposes to address the source of these exceedances and prevent future exceedances in the future.
- Ecology recommends that Ardagh Glass conduct additional discharge sampling, as practicable, for the fourth quarter 2018 discharge monitoring report in order to ascertain the performance of the treatment BMP improvements installed in May 2018. Additional sampling and associated additional data would better inform the Engineering Report already required by Level 3 Corrective Actions for Copper, due in 2019.
- The Permittee and Site Contact information that Ecology has on file for Ardagh Glass is out of date. In order to update the Site Contact information for the facility please email the necessary changes to Ecology Permit Administrator Josh Klimek at josh.klimek@ecy.wa.gov. In order to update the facility's Permittee please submit a Modification of Coverage form to Ecology. When completing the form you should select "Other" for the type of modification that is being requested and include an explanation that the modification is only to update the Permittee information. A copy of the Modification of Coverage form can be found here: <https://fortress.wa.gov/ecy/publications/SummaryPages/ECY070361.html>.

For questions about this report please contact Ecology Inspector Ben Billick at bbil461@ecy.wa.gov, (425) 649-7059, or Dept. of Ecology, Water Quality Program, 3190 160th Ave SE, Bellevue, WA. 98008.

For assistance with any of these compliance issues or recommendations regarding Best Management Practices see the Stormwater Management Manual for Western Washington, volumes IV and V (SWMM). To obtain a copy of the SWMM you may go to Ecology's website at: <http://www.ecy.wa.gov/programs/wq/stormwater/manual.html>

The Department of Ecology has the authority to issue formal enforcement actions including issuance of orders and civil penalties of up to \$10,000 per day per violation for violations of your NPDES permit and/or state laws and regulations.

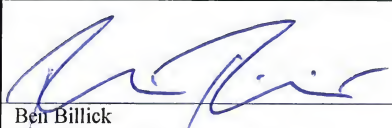

 Ben Billick Senior Water Quality Inspector Water Quality Program	 Alex White Water Quality Inspector Water Quality Program
12/4/18 Date	2018-12-04 Date

PHOTO ADDENDUM - ARDAGH GLASS 11/20/18**001 DESCRIPTION:** ALLIGATOR CRACKING OF PAVEMENT.**002 DESCRIPTION:** TRACK OUT OF FINE DEBRIS FROM STRATEGIC MATERIALS BUILDING AND SMALL PILES OF DEBRIS OUTSIDE OF DOORS.**003 DESCRIPTION:** PILE OF FINE DEBRIS ON PAVEMENT ALONG THE DUWAMISH RIVER IN DRAINAGE BASIN 3.**004 DESCRIPTION:** HEAVY DUST ACCUMULATION ON GROUND AROUND BAG HOUSES IN DRAINAGE BASIN 1.**005 DESCRIPTION:** DEBRIS AND SEDIMENT ACCUMULATION AT BASE OF DUMPSTER.**006 DESCRIPTION:** TREATMENT CATCH BASIN IN DRAINAGE BASIN 3.

PHOTO ADDENDUM - ARDAGH GLASS 11/20/18



007 DESCRIPTION: HEAVY SEDIMENT AND DEBRIS ACCUMULATION ON TOP OF THE TREATMENT MEDIA INSIDE THE CATCH BASIN SHOWN IN PHOTO 006.



008 DESCRIPTION: CONCRETE TRUCK THAT WAS WASHED OUT ONTO THE GROUND ADJACENT TO THE DUWAMISH RIVER. ALLIGATOR CRACKING ON PAVEMENT IN FOREGROUND OF PHOTO.



009 DESCRIPTION: CONCRETE WASHOUT WATER ON PAVEMENT ADJACENT TO THE RIVER. ALLIGATOR CRACKING ON PAVEMENT.



010 DESCRIPTION: HEAVY EQUIPMENT LEAKING ONTO THE GROUND.



011 DESCRIPTION: SHEEN ON WATER FROM LEAKING CONTRACTOR TRUCK.



012 DESCRIPTION: 55-GALLON OIL DRUM OFF OF SECONDARY CONTAINMENT PALLET IN THE MAINTENANCE SHOP.

Attachment 1

Ardagh Glass Warning Letter for Total Suspended Solids Effluent Limit Exceedances



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Ave SE • Bellevue, WA 98008-5452 • 425-649-7000
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

November 15, 2018

Mr. Michael Gibbons, Plant Manager
Ardagh Glass Inc
5801 E Marginal Way S
Seattle, WA 98134-2413

Re: **WARNING LETTER:** National Pollutant Discharge Elimination System (NPDES),
Industrial Stormwater General Permit (ISGP) Number WAR001134, Ardagh Glass Inc.

Dear Mr. Gibbons:

Your Discharge Monitoring Reports (DMRs) show that your facility was out of compliance with the effluents limits in the 1st, 2nd and 4th quarters of 2017 and the 1st and 2nd quarters of 2018 (see Table 1) according to the discharge limits set in your NPDES ISGP, and required parameters were not measured in the 3rd quarter of 2017. The Total Suspended Solids (TSS) effluent limit became effective on January 1, 2017 for discharges to a 303(d)-listed water (see ISGP special condition S6.C.1.c, Table 6), which includes the Duwamish Waterway.

The DMR is the principal tool used to evaluate compliance with permit requirements. The Department of Ecology (Ecology) places great importance on timely submittal of complete and accurate DMRs. Non-compliance notifications are required by your permit. Ecology received your notices of noncompliance dated August 5, 2017; November 13, 2017; February 14, 2018; May 15, 2018; and August 7, 2018; via DMR Facility Notes. Other than for February 15, 2017, this part of your permit requirement has been fulfilled.

Ecology notes that exceedance of TSS limits is a problem for your facility (Table 1). Ecology requests that you address the root source of this problem and propose a solution to prevent future exceedances. **Within 30 calendar days of receipt of this letter, submit a written response detailing your proposed solution to Ben Billick (bbil461@ecy.wa.gov).** Further failures to comply with the conditions of your permit could result in Ecology taking formal administrative enforcement action, including issuing orders and penalties.

If you have any questions or concerns, please contact ISGP inspector Alex White or Ben Billick:

Alex White	(425) 649-7263	alwh461@ecy.wa.gov
Ben Billick	(425) 649-7059	bbil461@ecy.wa.gov

Table 1: TSS Violations from January 2017 to present

<i>Sample Date</i>	<i>Monitoring Point</i>	<i>Sample Measurement</i>	<i>Max Limit</i>
February 15, 2017	3	360 mg/L	30 mg/L
February 15, 2017	4	150 mg/L	30 mg/L
May 16, 2017	3	430 mg/L	30 mg/L
May 16, 2017	4	140 mg/L	30 mg/L
September 29, 2017	1	Analysis not conducted	
September 29, 2017	3	Analysis not conducted	
September 29, 2017	4	Analysis not conducted	
October 17, 2017	3	86 mg/L	30 mg/L
October 17, 2017	4	72 mg/L	30 mg/L
March 9, 2018	1	110 mg/L	30 mg/L
March 9, 2018	2	60 mg/L	30 mg/L
March 9, 2018	3	1300 mg/L	30 mg/L
March 9, 2018	4	120 mg/L	30 mg/L
March 23, 2018	1	34 mg/L	30 mg/L
March 23, 2018	3	980 mg/L	30 mg/L
March 23, 2018	4	510 mg/L	30 mg/L
April 13, 2018	1	38 mg/L	30 mg/L
April 13, 2018	2	49 mg/L	30 mg/L
April 13, 2018	3	980 mg/L	30 mg/L
April 13, 2018	4	390 mg/L	30 mg/L

TSS = Total Suspended Solids

Sincerely,



Gretchen Onstad
Enforcement Coordinator
Water Quality Program

cc: Central Files: Ardagh Glass Inc, WAR001134, WQ 6.4
ec: Alex White, Ecology
Ben Billick, Ecology
Michael Gibbons, Plant Manager, Ardagh Glass Inc, michael.j.gibbons@ardaghgroup.com
Lana Getubig, HSE & FAC Mgr, Ardagh Glass Inc, lana.getubig@honeywell.com